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Attorneys for Defendant and Counter-Claimant
THIERRY GUETTA a/k/a MR. BRAINWASH

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

GLEN E. FRIEDMAN,

Plaintiff,

vs.

THIERRY GUETTA a/k/a MR.
BRAINWASH, and DOES 1 through
10, inclusive,

Defendants.

AND RELATED COUNTER-CLAIM.

Case No. CV10-0014 DDP (JCx)

**STIPULATION RE: ORDER TO NON-
PARTY PAYPAL, INC. NOT TO
PRODUCE DOCUMENTS IN
RESPONSE TO SUBPOENA UNTIL
MOTION TO QUASH IS HEARD AND
RULING IS ISSUED**

WHEREAS, Plaintiff's counsel served a subpoena for the production or records to
non-party PayPal, Inc. dated December 9, 2010;

WHEREAS, the subpoena commands documents to be produced by PayPal, Inc.
to Plaintiff's counsel on January 13, 2011;

WHEREAS, Defendant will file a motion to quash and/or modify the subpoena to be
heard on January 25, 2011;

WHEREAS, Defendant has initiated the process of preparing a motion to quash
and/or modify pursuant to the provisions set forth in L.R. 37;

WHEREAS, pursuant to the timing provisions set forth in L.R. 37, Defendant's

1 motion to quash and/or modify the subpoena cannot be heard prior to January 13, 2011;

2 WHEREAS, the parties wish to avoid an *ex parte* application seeking relief from the
3 provisions of L.R. 37; and

4 WHEREAS, the parties have agreed to stipulate to an order from this Court ordering
5 non-party PayPal, Inc. not to produce any documents responsive to the subpoena until
6 Defendant's motion to quash and/or modify the subpoena has been heard and the Court
7 has issued a ruling in that regard:

8 IT IS HEREBY STIPULATED AND AGREED as follows:

9 Plaintiff Glen E. Friedman, by and through his counsel of record, and Defendant
10 Thierry Guetta, by and through his counsel of record, stipulate and agree to an order from
11 this Court ordering non-party PayPal, Inc. not to produce any documents responsive to the
12 subpoena issued to it on December 9, 2010, until Defendant's motion to quash and/or
13 modify the subpoena is heard and the Court has issued a ruling in that regard.

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15 Dated: December 28, 2010

THE LINDE LAW FIRM

16
17 By: /s/ Douglas A. Linde
18 Douglas A. Linde
19 Attorneys for Plaintiff and Counter-Defendant
GLEN E. FRIEDMAN

20 Dated: December 28, 2010

LAW OFFICES OF ALAN S. GUTMAN

21
22 By: /s/ John Juenger
23 John Juenger
24 Attorneys for Defendant and Counter-Claimant
25 THIERRY GUETTA a/k/a MR. BRAINWASH
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